

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

1201 NORTH MARKET STREET
P.O. BOX 1347
WILMINGTON, DELAWARE 19899-1347

(302) 658-9200
(302) 658-3989 FAX

ALEXANDRA M. CUMINGS
(302) 351-9248
(302) 425-4670 FAX
acumings@morrisnichols.com

July 7, 2025

VIA E-FILE

The Honorable Leonard P. Stark
U.S. Court of Appeals for the Federal Circuit
717 Madison Place, NW
Washington, D.C. 20439

Re: *Crystallex International Corp. v. Bolivarian Republic of Venezuela*,
D. Del. C.A. No. 1:17-mc-00151-LPS

Dear Judge Stark:

I write on behalf of PDV Holding, Inc. (“PDVH”) and CITGO Petroleum Corporation (“CITGO”) regarding the sealed Notice of Objections that PDVH and CITGO submitted contemporaneously to the Court today. CITGO and PDVH now submit this letter to explain the basis for filing the Notice of Objections under seal and to relay that they will promptly submit a redacted version for filing on the Court’s public docket.

The Notice of Objection was filed under seal because it contains information designated as confidential, namely, information disclosed to the Sale Process Parties by the Special Master regarding bids and the sale process.

CITGO and PDVH take no position on whether the information in the Notice of Objections should remain under seal. However, the Special Master has repeatedly told CITGO and PDVH that he considers such information confidential under the Confidentiality Order and has instructed the CITGO and PDVH not to disclose it in public filings. *See e.g.*, D.I. 1376 at 2 (CITGO, PDVH, and PDVSA’s motion for leave to file confidential information under seal based on the Special Master’s instruction to do so); D.I. 291 ¶ 1; *id.* ¶¶ 4, 8 (prohibiting parties from disclosing, summarizing, describing, or characterizing “non-public, confidential, proprietary, or commercially sensitive information” to anyone other than the Court, the Sale Process Parties, or “other persons whom the Special Master agrees may possess Confidential Information”).

The Honorable Leonard P. Stark

July 7, 2025

Page 2

Counsel for CITGO and PDVH have conferred with counsel for the Special Master regarding the Notice of Objections. CITGO and PDVH will serve the Special Master with the sealed Notice of Objections, and the Special Master will advise CITGO and PDVH within 24 hours what, if any, redactions he requires. Counsel for CITGO and PDVH will file a redacted version of the Notice of Objections promptly thereafter.

Respectfully,

/s/ Alexandra M. Cumings

Alexandra M. Cumings (#6146)

cc: All Counsel of Record